

**United States Bankruptcy Court  
District Of New Jersey**

Caption In Compliance With D.N.J. LBR  
9004-1

**Duane Morris LLP  
A Delaware Limited Liability Partnership**  
Russell W. Roten, Esquire  
(*Pro Hac Vice* Admission Pending)  
865 South Figueroa Street, Suite 3100  
Los Angeles, CA 90017-5450  
Telephone: (213) 689-7439  
Facsimile: (213) 402-8594  
E-mail: RWRoten@duanemorris.com

*Counsel for Atlanta International Insurance Company (as successor in interest to Drake Insurance Company); AIG Property Casualty Company (f/k/a Birmingham Fire Insurance Company of Pennsylvania); AIG Europe S.A. (as successor in interest to Union Atlantique d'Assurances S.A.); AIU Insurance Company; ASR Schadeverzekering N.V. (as successor in interest to Assurantiekoor Van Wijk & Co.); Granite State Insurance Company; The Insurance Company of the State of Pennsylvania; Lexington Insurance Company; National Union Fire Insurance Company of Pittsburgh, Pa.; New Hampshire Insurance Company; The North River Insurance Company; Starr Indemnity & Liability Company (as successor in interest to Republic Insurance Company); N.V. Schadeverzekeringsmaatschappij Maas Lloyd (individually and as successor in interest to policies subscribed in favor of Johnson & Johnson by N.V. Rotterdamse Assurantiekas, n/k/a De Ark); and RheinLand Versicherungen (as successor in interest only to the subscriptions of the former Dutch company Rheinland Verzekeringen)*

In Re:  LTL Management LLC,  Debtor.	Chapter 11  Case No. 21-30589  Judge: Michael B. Kaplan
In Re:  LTL MANAGEMENT LLC,  Plaintiff,  v.  THOSE PARTIES LISTED ON APPENDIX A TO COMPLAINT and JOHN AND JANE DOES 1-1000,  Defendants.	Adv. No. 21-03032 (MBK)

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF DOCUMENTS**

**PLEASE TAKE NOTICE** that Duane Morris LLP ("Duane Morris"), acting by and through Russell W. Roten, hereby appears in the above-captioned case as counsel for Atlanta International Insurance Company (as successor in interest to Drake Insurance Company); AIG Property Casualty Company (f/k/a Birmingham Fire Insurance Company of Pennsylvania); AIG Europe S.A. (as successor in interest to Union Atlantique d'Assurances S.A.); AIU Insurance Company; ASR Schadeverzekering N.V. (as successor in interest to Assurantiekoor Van Wijk & Co.); Granite State Insurance Company; The Insurance Company of the State of Pennsylvania; Lexington Insurance Company; National Union Fire Insurance Company of Pittsburgh, Pa.; New Hampshire Insurance Company; The North River Insurance Company; Starr Indemnity & Liability Company (as successor in interest to Republic Insurance Company); N.V. Schadeverzekeringsmaatschappij Maas Lloyd (individually and as successor in interest to policies subscribed in favor of Johnson & Johnson by N.V. Rotterdamse Assurantiekas, n/k/a De Ark); and

RheinLand Versicherungen (as successor in interest only to the subscriptions of the former Dutch company Rheinland Verzekeringen), and requests, pursuant to Federal Rules of Bankruptcy Procedure 2002, 9007, and 9010(b), that copies of all notices, documents and pleadings given or filed in the above-captioned case be given and served upon:

Russell W. Roten, Esquire  
*(Pro Hac Vice Admission Pending)*  
865 South Figueroa Street, Suite 3100  
Los Angeles, CA 90017-5450  
Telephone: (213) 689-7439  
Facsimile: (213) 402-8594  
E-mail: [RWRoten@duanemorris.com](mailto:RWRoten@duanemorris.com)

**PLEASE TAKE FURTHER NOTICE** that the foregoing demand includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral and whether transmitted or conveyed by mail, e-mail, facsimile, telephone, telegraph, or otherwise filed or made with regard to the above-captioned case and proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive Republic's: (i) right to have final orders in non-core matters entered only after de novo review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which Republic is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are reserved.

**DOCUMENTS:**

- All notices entered pursuant to Fed. R. Bankr. P. 2002.
- All documents and pleadings of any nature, including claim objections.

Respectfully submitted,

Duane Morris LLP  
A Delaware Limited Liability Company

Dated: August 4, 2022

/s/ Russell W. Roten

Russell W. Roten, Esquire  
(*Pro Hac Vice Admission Pending*)  
865 South Figueroa Street, Suite 3100  
Los Angeles, CA 90017-5450  
Telephone: (213) 689-7439  
Facsimile: (213) 402-8594  
E-mail: RWRoten@duanemorris.com

*Counsel for Atlanta International Insurance Company (as successor in interest to Drake Insurance Company); AIG Property Casualty Company (f/k/a Birmingham Fire Insurance Company of Pennsylvania); AIG Europe S.A. (as successor in interest to Union Atlantique d'Assurances S.A.); AIU Insurance Company; ASR Schadeverzekering N.V. (as successor in interest to Assurantiekoor Van Wijk & Co.); Granite State Insurance Company; The Insurance Company of the State of Pennsylvania; Lexington Insurance Company; National Union Fire Insurance Company of Pittsburgh, Pa.; New Hampshire Insurance Company; The North River Insurance Company; Starr Indemnity & Liability Company (as successor in interest to Republic Insurance Company); N.V. Schadeverzekeringsmaatschappij Maas Lloyd (individually and as successor in interest to policies subscribed in favor of Johnson & Johnson by N.V. Rotterdamse Assurantiekas, n/k/a De Ark); and RheinLand Versicherungen (as successor in interest only to the subscriptions of the former Dutch company Rheinland Verzekeringen)*